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Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
	:	
In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**CERTIFICATE OF NO OBJECTION UNDER
28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS
OBJECTIONS SCHEDULED FOR HEARING ON NOVEMBER 22, 2013**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), or LBHI as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of LBHI and its Affiliated Debtors (the "Plan Administrator"), filed the following motions

and omnibus claims objections (collectively, the “Claims Objections”) with the Court for hearing on or before November 22, 2013:

- (a) Four Hundred Thirty-Ninth Omnibus Objection to Claims (No Liability Claims) [ECF No. 40471]
- (b) Four Hundred Fortieth Omnibus Objection to Claims (Insufficient Documentation Claims) [ECF No. 40472]
- (c) Four Hundred Forty-First Omnibus Objection to Claims (No Liability Derivatives Claims) [ECF No. 40473]
- (d) Four Hundred Forty-Second Omnibus Objection to Claims (Settled Derivatives Claims) [ECF No. 40474]
- (e) Four Hundred Forty-Third Omnibus Objection to Claims (Valued Derivative Claims) [ECF No. 40475]
- (f) Four Hundred Forty-Fourth Omnibus Objection to Claims (Contribution Claims) [ECF No. 40476]

2. In accordance with the Second Amended Case Management Order, the Debtors, or the Plan Administrator, as applicable, established deadlines (the “Response Deadline”) for each Claim Objection for parties to object or file responses. The Response Deadlines have been extended for certain creditors from time to time. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Debtors or the Plan

Administrator (or such responsive pleadings have been withdrawn) by any of the holders of the claims included on Exhibit 1 to any of the Orders attached hereto, which include only the proofs of claim for which the Claims Objection will be granted. Responses to certain of the Claims Objections were filed on the docket, or served on the Debtors or the Plan Administrator, by holders of certain proofs of claim included on the Claims Objections. The hearing on the Claims Objections as to any proof of claim for which a response was either filed on the docket or received by the Debtors or the Plan Administrator, and which response has not been resolved, has been adjourned to a future date.

4. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed orders granting the Claims Objections annexed hereto as Exhibits A through F, which, except for the inclusion of additional language to indicate that such order is supplemental to a previously entered order for a Claim Objection or to reference the inclusion of separate exhibits attached to the proposed orders for proofs of claim for which the Claims Objection is granted, adjourned or withdrawn, are unmodified since the filing of the Claims Objections, be

entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: November 21, 2013
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

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Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates

EXHIBIT A
(Proposed Order – ECF No. 40471)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE FOUR HUNDRED THIRTY-NINTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred thirty-ninth omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Thirty-Ninth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (ECF No. 6664) (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims, all as more fully described in the Four Hundred Thirty-Ninth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Thirty-Ninth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Thirty-Ninth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Thirty-Ninth Omnibus Objection to Claims establish just

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Thirty-Ninth Omnibus Objection to Claims.

cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred Thirty-Ninth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Thirty-Ninth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 439: EXHIBIT 1 - NO LIABILITY CLAIM

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 BLATT, JASON	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/09/2009	10949	\$2,000,000.00	\$2,000,000.00	Claim is based on Blatt's allegation of unlawful termination. Blatt, however, was an employee of LBI, not LBHI. Thus, LBHI has no liability to Blatt in connection with his claim for unlawful termination.
2 CGKL VENTURES, LLC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24346	Undetermined	Undetermined	LBHI has no prepetition liability to CGKL Ventures, LLC under the Contingent Promote Agreement (as such term is defined in Claim No. 24346).
3 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28116	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the Trust Agreement (as such terms are defined in Claim No. 28116).
4 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28117	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the Trust Agreement (as such terms are defined in Claim No. 28117).
5 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28118	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 28118).
6 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28119	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 28119).
7 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32104	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32104).
8 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32105	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32105).

OMNIBUS OBJECTION 439: EXHIBIT 1 - NO LIABILITY CLAIM

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
9 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32106	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32106).
10 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32112	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32112).
11 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32113	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32113).
12 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32114	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32114).
13 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32115	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32115).
14 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32116	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the Trust Agreement (as such terms are defined in Claim No. 32116).
15 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32117	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32117).
16 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32128	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32128).

OMNIBUS OBJECTION 439: EXHIBIT 1 - NO LIABILITY CLAIM

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
17 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32129	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32129).
18 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32130	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32130).
19 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32131	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the PSA (as such terms are defined in Claim No. 32131).
20 CWCAPITAL ASSET MANAGEMENT LLC, AS SPECIAL SERVICER FOR BANK OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32132	Undetermined	Undetermined	LBHI has no liability to CW Capital Asset Management, LLC, as Special Servicer, under the MLPA and/or the Trust Agreement (as such terms are defined in Claim No. 32132).
21 DEUTSCHE PFANDBRIEFBANK AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17549	Undetermined	Undetermined	LBHI has no liability to Deutsche Pfandbriefbank AG under the Guarantee (as such term is defined in Claim No. 17549).
22 DEUTSCHE PFANDBRIEFBANK AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17550	Undetermined	Undetermined	LBHI has no liability to Deutsche Pfandbriefbank AG under the Guarantee (as such term is defined in Claim No. 17550).
23 FCCD LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20734	Undetermined	Undetermined	LBHI has no liability to FCCD Limited pursuant to the Participation Agreement (as such term is defined in Claim No. 20734).
24 FCCD LIMITED	08-13900 (JMP)	Lehman Commercial Paper Inc.	09/21/2009	20736	Undetermined	Undetermined	LCPI has no liability to FCCD Limited pursuant to the Participation Agreement (as such term is defined in Claim No. 20736).
25 HENGELER MUELLER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/15/2009	12773	\$12,327.41	\$12,327.41	Claim is for services provided to Lehman Brothers Bankhaus AG ("Bankhaus") following the Commencement Date. LBHI has no liability in connection therewith.

OMNIBUS OBJECTION 439: EXHIBIT 1 - NO LIABILITY CLAIM

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
26 ORIX CAPITAL MARKETS, LLC, AS SPECIAL SERVICER FOR WELLS FARGO BANK,	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32399	Undetermined	Undetermined	LBHI has no liability to Orix Capital Markets, LLC pursuant to the Mortgage Loan Purchase Agreement (as such term is defined in Claim No. 32399). Additionally, Claim No. 32399 is duplicative of Claim No. 33068.
27 RATHENAU-PASSAGE VERWALTUNGS-GMB H & CO.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	16048	\$8,960,203.27	\$8,960,203.27	Claim arises out of LBHI's alleged guarantee of certain obligations of Bankhaus. The Plan Administrator understands that claimant has been paid in full in Bankhaus' insolvency proceeding. Consequently, LBHI has no liability to claimant in connection with Claim No. 16048.
28 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30869	\$1,766,953.96 *	\$1,766,953.96 *	Duplicate of Claim No. 65855.
29 U.S. BANK NATIONAL ASSOCIATION	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	30970	\$1,766,953.96 *	\$1,766,953.96 *	Duplicate of Claim No. 29559.
30 U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE	08-13900 (JMP)	Lehman Commercial Paper Inc.	09/22/2009	27162	Undetermined	Undetermined	LCPI has no liability to U.S. Bank, N.A., as trustee, in connection with Claim No. 27162.
31 WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32158	Undetermined	Undetermined	LBHI has no liability to Wells Fargo Bank, N.A., as Trustee, under the Mortgage Loan Purchase Agreement (as such term is defined in Claim No. 32158).
32 WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33068	Undetermined	Undetermined	LBHI has no liability to Wells Fargo Bank, N.A., as Trustee, under the Mortgage Loan Purchase Agreement (as such term is defined in Claim No. 33068).

OMNIBUS OBJECTION 439: EXHIBIT 1 - NO LIABILITY CLAIM

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
33 WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33079	Undetermined	Undetermined	LBHI has no liability to Wells Fargo Bank, N.A., as Trustee, under the Mortgage Loan Purchase Agreement (as such term is defined in Claim No. 33079).
34 WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN	09-10558 (JMP)	Structured Asset Securities Corporation	09/22/2009	33086	Undetermined	Undetermined	SASCO has no liability to Wells Fargo Bank, N.A., as Trustee, in connection with Claim No. 33086.
35 WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33110	Undetermined	Undetermined	LBHI has no liability to Wells Fargo Bank, N.A., as Trustee, under the Sale Agreement or the Pooling and Servicing Agreement (as such terms are defined in Claim No. 33110).
TOTAL					\$14,506,438.60	\$14,506,438.60	

EXHIBIT B
(Proposed Order – ECF No. 40472)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING FOUR HUNDRED FORTIETH OMNIBUS
OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the four hundred fortieth omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Fortieth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Four Hundred Fortieth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Fortieth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Fortieth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Fortieth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Fortieth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Fortieth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Fortieth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 440: EXHIBIT 1 - INSUFFICIENT DOCUMENTS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 COUNTY OF LAKE, OHIO	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	29757	Undetermined	Undetermined	Insufficient Documents
2 COUNTY OF LAKE, OHIO	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29761	Undetermined	Undetermined	Insufficient Documents
3 U.S. BANK NATIONAL ASSOCIATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31009	Undetermined	Undetermined	Insufficient Documents
4 U.S. BANK NATIONAL ASSOCIATION	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	31018	Undetermined	Undetermined	Insufficient Documents
TOTAL					\$0.00	\$0.00	

EXHIBIT C
(Proposed Order – ECF No. 40473)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING FOUR HUNDRED FORTY-FIRST OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the four hundred forty-first omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Forty-First Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which LBHI has no liability, all as more fully described in the Four Hundred Forty-First Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-First Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Four Hundred Forty-First Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-First Omnibus Objection to Claims.

management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Four Hundred Forty-First Omnibus Objection to Claims is in the best interests of LBHI, its creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Forty-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Forty-First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Four Hundred Forty-First Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 441: EXHIBIT 1 - NO LIABILITY DERIVATIVES CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 ANTHRACITE INVESTMENTS (CAYMAN) LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	26510	\$329,631.04 *	\$329,631.04 *	No Liability Claim - Derivative
TOTAL					\$329,631.04	\$329,631.04	

EXHIBIT D
(Proposed Order – ECF No. 40474)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING FOUR HUNDRED FORTY-SECOND
OMNIBUS OBJECTION TO CLAIMS (SETTLED DERIVATIVES CLAIMS)**

Upon the four hundred forty-second omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Forty-Second Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), in accordance with section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance and expungement of the Settled Derivatives Claims on the grounds that the Settled Derivatives Claims are contrary to settlements that the parties have entered into, all as more fully described in the Four Hundred Forty-Second Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-Second Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) each claimant listed on Exhibit A attached to the Four Hundred Forty-Second Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17,

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-Second Omnibus Objection to Claims.

2010, governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Forty-Second Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Forty-Second Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Forty-Second Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Settled Derivatives Claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Four Hundred Forty-Second Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 442: EXHIBIT 1 - SETTLED DERIVATIVES CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 SAPHIR FINANCE PUBLIC LIMITED COMPANY	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	25830	Undetermined	Undetermined	No Liability Claim - Derivative
2 SAPHIR FINANCE PUBLIC LIMITED COMPANY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25832	Undetermined	Undetermined	No Liability Claim - Derivative
TOTAL					\$0.00	\$0.00	

EXHIBIT E
(Proposed Order – ECF No. 40475)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE FOUR HUNDRED FORTY-THIRD
OMNIBUS OBJECTION TO CLAIMS (VALUED DERIVATIVE CLAIMS)**

Upon the four hundred forty-third omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Forty-Third Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the “Procedures Order”), seeking to reduce and allow the Valued Derivative Claims, as more fully described in the Four Hundred Forty-Third Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-Third Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Four Hundred Forty-Third Omnibus Objection to Claims; and (vi) all other parties

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-Third Omnibus Objection to Claims.

entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9653]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Forty-Third Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Forty-Third Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred Forty-Third Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby (i) modified and allowed in the amount set forth on Exhibit 1 in the row “Claim As Modified” and (ii) any asserted amount in excess of the modified amount is disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Four Hundred Forty-Third Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 443: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS					
				ADMINIS- TRATIVE	SECURED	PRIORITY	UNSECURED	EQUITY	TOTAL
1 BEACH POINT STRATEGIC MASTER FUND, L.P.	14731	9/17/09	Lehman Brothers Special Financing Inc.						
			TOTAL ASSERTED AMOUNT				\$51,581.80		\$51,581.80 *
			CLAIM AS MODIFIED				\$51,581.80		\$51,581.80
2 BEACH POINT STRATEGIC MASTER FUND, L.P.	14737	9/17/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$51,581.80		\$51,581.80 *
			CLAIM AS MODIFIED				\$51,581.80		\$51,581.80
3 BEACH POINT TOTAL RETURN MASTER FUND, L.P.	14732	9/17/09	Lehman Brothers Special Financing Inc.						
			TOTAL ASSERTED AMOUNT				\$27,259.67		\$27,259.67 *
			CLAIM AS MODIFIED				\$27,259.67		\$27,259.67
4 BEACH POINT TOTAL RETURN MASTER FUND, L.P.	14738	9/17/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$27,259.67		\$27,259.67 *
			CLAIM AS MODIFIED				\$27,259.67		\$27,259.67
5 NATIONAL CITY BANK	21404	9/21/09	Lehman Brothers Financial Products Inc.						
			TOTAL ASSERTED AMOUNT				\$288,060.00		\$288,060.00 *
			CLAIM AS MODIFIED				\$29.00		\$29.00
6 PAR-FOUR MASTER FUND LTD	33317	9/18/09	Lehman Brothers Special Financing Inc.						
			TOTAL ASSERTED AMOUNT				\$563,139.38		\$563,139.38 *
			CLAIM AS MODIFIED				\$563,139.38		\$563,139.38
7 PAR-FOUR MASTER FUND LTD	33318	9/18/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$563,139.38		\$563,139.38 *
			CLAIM AS MODIFIED				\$563,139.38		\$563,139.38
8 RAPAX OC MASTER FUND, LTD.	29771	9/22/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$724,000.00		\$724,000.00 *
			CLAIM AS MODIFIED				\$724,000.00		\$724,000.00

OMNIBUS OBJECTION 443: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS					
				ADMINIS- TRATIVE	SECURED	PRIORITY	UNSECURED	EQUITY	TOTAL
9 RAPAX OC MASTER FUND, LTD.	29772	9/22/09	Lehman Brothers Commodity Services Inc.						
			TOTAL ASSERTED AMOUNT				\$724,000.00		\$724,000.00 *
			CLAIM AS MODIFIED				\$724,000.00		\$724,000.00
10 RELIANT ENERGY SERVICES, INC NKA RRI,INC	27753	9/22/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$310,400.00		\$310,400.00 *
			CLAIM AS MODIFIED				\$310,400.00		\$310,400.00
11 RELIANT ENERGY SERVICES, INC NKA RRI,INC	27754	9/22/09	Lehman Brothers Commodity Services Inc.						
			TOTAL ASSERTED AMOUNT				\$310,400.00		\$310,400.00 *
			CLAIM AS MODIFIED				\$310,400.00		\$310,400.00
12 RUBY FINANCE PLC - SERIES 2003-4	25821	9/21/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$290,731.25		\$290,731.25 *
			CLAIM AS MODIFIED				\$290,731.25		\$290,731.25
13 RUBY FINANCE PLC - SERIES 2003-4	25822	9/21/09	Lehman Brothers Special Financing Inc.						
			TOTAL ASSERTED AMOUNT				\$290,731.25		\$290,731.25 *
			CLAIM AS MODIFIED				\$290,731.25		\$290,731.25
14 SERENGETI OPPORTUNITIES MM L.P.	29771	9/22/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$623,576.70		\$623,576.70 *
			CLAIM AS MODIFIED				\$623,576.70		\$623,576.70
15 SERENGETI OPPORTUNITIES MM L.P.	29772	9/22/09	Lehman Brothers Commodity Services Inc.						
			TOTAL ASSERTED AMOUNT				\$623,576.70		\$623,576.70 *
			CLAIM AS MODIFIED				\$623,576.70		\$623,576.70
16 SERENGETI OVERSEAS MM L.P.	29771	9/22/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$211,365.05		\$211,365.05 *
			CLAIM AS MODIFIED				\$211,365.05		\$211,365.05

OMNIBUS OBJECTION 443: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS					
				ADMINIS-TRATIVE	SECURED	PRIORITY	UNSECURED	EQUITY	TOTAL
17 SERENGETI OVERSEAS MM L.P.	29772	9/22/09	Lehman Brothers Commodity Services Inc.						
			TOTAL ASSERTED AMOUNT				\$211,365.05		\$211,365.05 *
			CLAIM AS MODIFIED				\$211,365.05		\$211,365.05
18 STRUCTURED CREDIT OPPORTUNITIES FUND II LP	23753	9/21/09	Lehman Brothers Special Financing Inc.						
			TOTAL ASSERTED AMOUNT				\$120,712.00		\$120,712.00 *
			CLAIM AS MODIFIED				\$120,712.00		\$120,712.00
19 STRUCTURED CREDIT OPPORTUNITIES FUND II LP	23757	9/21/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$120,712.00		\$120,712.00 *
			CLAIM AS MODIFIED				\$120,712.00		\$120,712.00
TOTAL ASSERTED				\$0.00	\$0.00	\$0.00	\$6,133,591.70	\$0.00	\$6,133,591.70
TOTAL NOT SUBJECT TO OBJECTION				0.00	0.00	0.00	0.00	0.00	0.00
TOTAL SUBJECT TO OBJECTION				0.00	0.00	0.00	6,133,591.70	0.00	6,133,591.70
TOTAL CLAIM AS MODIFIED				\$0.00	\$0.00	\$0.00	\$5,845,560.70	\$0.00	\$5,845,560.70

EXHIBIT F
(Proposed Order – ECF No. 40476)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE FOUR HUNDRED FORTY-FOURTH
OMNIBUS OBJECTION TO CLAIMS (CONTRIBUTION CLAIMS)**

Upon the four hundred forty-fourth omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Forty-Fourth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(e)(1)(B) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the Contribution Claims on the grounds that such claims should be disallowed under section 502(e)(1)(B) of the Bankruptcy Code, all as more fully described in the Four Hundred Forty-Fourth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-Fourth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Forty-Fourth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-Fourth Omnibus Objection to Claims.

parties in interest and that the legal and factual bases set forth in the Four Hundred Forty-Fourth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred Forty-Fourth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(e)(1)(B) of the Bankruptcy Code, the claim listed on Exhibit 1 annexed hereto is disallowed and expunged, with prejudice, to the extent set forth therein; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Four Hundred Forty-Fourth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto and (ii) the portion of any Contribution Claim that is not the subject of the Four Hundred Forty-Fourth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 444: EXHIBIT 1 - CONTRIBUTION CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	DESCRIPTION OF CONTRIBUTION CLAIM
1 TRAVELERS CASUALTY AND SURETY COMPANY OF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/26/2008	36	Undetermined	Undetermined	Claimant asserts that it issued surety bonds to certain of LBHI's bondholders and filed Claim 36 as a contingent claim for reimbursement and indemnification from LBHI for any payments that claimant may make to the bondholders.
TOTAL					\$0.00	\$0.00	